

## **CVMC PERSONAL INFORMATION POLICY**

### **INTRODUCTION**

Christian Veterinary Missions Canada (CVMC) is an organization committed to serving Jesus Christ through the veterinary profession. The CVMC is a non-profit organization, is not a school or university, and is financed primarily by public, corporate and other donations. Christian Veterinary Missions Canada is a fellowship of veterinarians, veterinary students and others of allied interest which gives the opportunity to minister through our profession to the needs of veterinarians, people and their animals worldwide. The organization is committed to empower veterinarians, technicians and veterinary students to Christian ministry through the veterinary profession.

Christian Veterinary Missions Canada is governed by a Board of Directors elected from the regular membership of the CVMC. Christian Veterinary Missions Canada, in its desire to further the Kingdom of God throughout the world through the veterinary profession, is taking an active role in many facets of Christian ministry available to today's Christian animal health professional. The CVMC is committed to respecting the privacy rights of all individuals, including CVMC members, employees, and missionary applicants by ensuring that their personal information is collected, used and disclosed in an appropriate manner.

The CVMC collects personal information about its members and missionary applicants for purposes of effectively communicating with, facilitating missionary work, and providing services to these people. The CVMC also collects personal information about its employees for purposes of personnel management and administration.

The *Personal Information Protection and Electronic Documents Act* ("PIPEDA") is Federal legislation which came into effect on January 1, 2001.

The principles established in the personal information policy of CVMC correspond to the principles set out in the Canadian Standard Association's Model Code for the Protection of Personal Information, and conform with the requirements with PIPEDA. This personal information policy may be amended in response to changes in Provincial or Federal privacy legislation in the future, to ensure that this policy conforms with such legislation.

### **POLICIES**

#### *1. Accountability*

The CVMC undertakes to be accountable for the personal information of members, missionaries and employees under its control. The CVMC also

undertakes to be accountable for the personal information of any applicant veterinarian or associated persons applying for membership and/or participation in the activities of the CVMC.

The CVMC will be responsible for maintaining and protecting the personal information of members and employees of the organization while it is under the control of the CVMC. This includes any information that may need to be disclosed to third parties for processing or other administrative functions under the Bylaws of the CVMC.

The CVMC Board of Directors will designate an individual who will be accountable for compliance with the personal information policy and procedures of CVMC. The individual appointed to be accountable for CVMC's compliance will be known as the "Privacy Officer". Unless otherwise stipulated by the Board of Directors, the Executive Director of the CVMC shall be the Privacy Officer.

The CVMC is committed to protecting personal information, and accordingly will include an appropriate level of protection in contractual arrangements with third parties (or obtain appropriate assurances from third parties) who receive personal information from the CVMC.

The CVMC will ensure that its members, employees and other interested individuals have the opportunity to review and update their own personal information on file with the CVMC. All such persons will be advised that questions and concerns can be directed to the Privacy Officer.

## 2. *Identifying the Purposes for Collection of Personal Information*

The CVMC will identify the purposes for which it collects personal information at or before the time the information is collected. Written notification of such purposes will be used when it is feasible to do so, but the CVMC may elect to identify such purposes verbally.

Common purposes for the collection of personal information include:

- i. Enabling a veterinarian, veterinary technician or other associated person to make application to become a member of the CVMC.
- ii. Enabling a veterinarian, veterinary technician or other associated person to make application to become a missionary or member of a mission team with the CVMC.
- iii. Enabling an existing member to renew his or her membership with the CVMC.

- iv. Enabling the CVMC to communicate effectively with its members and other interested persons to provide information on CVMC activities.
- v. Enabling the CVMC to communicate with former members and missionaries.
- vi. Enabling the CVMC to undertake fundraising activities for the purposes of supporting the mandate of the CVMC.
- vii. Enabling the CVMC to perform necessary administrative functions under the Bylaws of the CVMC, and as required by the Federal laws, and the laws of the Province of Ontario.

The CVMC will identify additional purposes that arise for the collection of personal information. The CVMC will communicate such additional purposes to its members and interested individuals, if it is appropriate in the circumstances to explain the purpose for which the personal information is collected.

### 3. *Consent*

The CVMC will obtain the consent from individuals for the collection, use or disclosure of their personal information. The CVMC will make every effort to obtain the express consent from an individual, although there may be circumstances where the CVMC will determine that consent has been implied by an individual. Express consent must be in writing; implied consent will not be in writing, but the circumstances relating to the provision of implied consent shall be such that a reasonable person would conclude that the individual has consented to the collection, use or disclosure of his or her personal information.

There may be situations where consent is given verbally, either in person or over the telephone. If the CVMC obtains verbal consent from a member or employee, a note of that consent must be recorded by the CVMC and, if applicable, be included in the file of the member, employee or other person providing such verbal consent.

The CVMC shall include on the membership and missionary application forms an express statement that the individual signing the form is consenting to the collection, use and disclosure of his or her personal information. It is recognized that there will be situations where the applicant, or the member fails to execute the form as evidence of his or her consent. If the form is otherwise properly completed, the CVMC may imply the consent of the individual to the collection, use and disclosure of his or her personal information.

The consent of an individual may be withdrawn at any time. The CVMC generally requires such withdrawal to be in writing, but will recognize verbal

communication of withdrawal of consent when it is appropriate to do so in the circumstances.

4. *Limitations on the Collection of Personal Information*

The CVMC will only collect personal information which is necessary for the purposes which have been identified. Personal information shall be collected by fair and lawful means, and will not be collected for commercial, unspecified or improper purposes.

5. *Limitation on the Use, Disclosure and Retention of Personal Information*

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual providing the personal information or except where use or disclosure required by federal or provincial law. The CVMC will establish appropriate criteria for the retention of personal information.

6. *Accuracy*

The CVMC will make every reasonable effort to ensure that personal information collected by it will be as accurate, complete and up-to-date as possible for the purposes for which the information is to be used.

The CVMC will on an ongoing basis make every effort to ensure the accuracy and completeness of personal information under its control. Most personal information will be collected on the application and donation forms, and the individual providing personal information will have the opportunity to do so in an accurate and complete manner.

The CVMC will develop a procedure to enable members and employees to update personal information on file. The CVMC will review regularly the accuracy and completeness of personal information on file.

7. *Safeguards*

The CVMC shall safeguard and protect personal information under its control by implementing security measures appropriate to the sensitivity of the information.

The methods of protection will include, but will not be limited to:

- a. physical measures (locked filing cabinets, restricted access to files and offices);
- b. technological measures (passwords, encryptions, firewalls, and audits); and
- c. organizational controls (access clearances, limiting access on a "need-to-know"

basis, staff training, confidentiality agreements, policies and procedures).

The CVMC shall ensure that its employees keep all personal information confidential and comply with the security standards established by the CVMC.

The CVMC shall require third parties to whom personal information is disclosed to commit in writing to an appropriate level of security in protection of such information to satisfy the standards established by the CVMC.

On the disposal or destruction of personal information, the CVMC shall take the necessary precautions to prevent third parties from accessing such information and to maintain the confidentiality of such information.

8. *Transparency*

The CVMC will make available to any interested individual specific information about the CVMC's policies and procedures relating to personal information which is under the control of the CVMC. The CVMC will facilitate access to its personal information policies and procedures, and will make available information concerning the identity of its Privacy Officer, and the means by which a person can communicate with the Privacy Officer. The CVMC will also ensure that individuals are aware of the means of gaining access to their personal information.

9. *Individual Access to Personal Information*

An individual providing personal information to the CVMC will be informed about the existence, use and disclosure of his or her personal information, and will be given access to and the right to ensure the accuracy and completeness of such information. An individual will be able to address the accuracy and completeness of his or her personal information and have it amended, if inaccurate or incomplete.

The CVMC will respond promptly to any request by an individual for access to his or her personal information.

The CVMC will maintain a complete record of third parties to whom personal information has been disclosed, and will make such record available to an individual whose personal information has been so disclosed.

10. *Questions and Concerns Regarding Compliance with this Policy*

An individual providing personal information to the CVMC may address any question, concern or complaint regarding the CVMC's compliance with this personal information policy to the Privacy Officer.

The CVMC will establish a procedure for processing any enquiry or complaint about the personal information policy to ensure that all enquiries or complaints are dealt with in an objective, fair and expeditious manner.

The CVMC shall inform individuals who make inquiries or lodge complaints of the existence of relevant complaint procedures.

The CVMC shall investigate all complaints. If a complaint is found to be justified, the CVMC will take appropriate measure, including, if necessary, amending its policies and practices.

When a challenge is not resolved to the satisfaction of the individual, the substance of the unresolved challenge shall be recorded by the CVMC.

Approved by the Board of Directors of the CVMC

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